

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF DELAWARE

JAMES M. BAKER, On Behalf of Himself
and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

Case No. 1:05-cv-00272-GMS

CLASS ACTION

ROCHELLE PHILLIPS, On Behalf of
Herself and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

Case No. 1:05-cv-00277-GMS

CLASS ACTION

ROBERT WILKINS, On Behalf of Himself
and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

Case No. 1:05-cv-00287-GMS

CLASS ACTION

LEONARD BRONSTEIN, On Behalf of
Himself and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

Case No. 1:05-cv-00289-GMS

CLASS ACTION

GREGG PENN, On Behalf of Himself and
All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

Case No. 1:05-cv-00293-GMS

CLASS ACTION

CLIFFORD W. JONES, On Behalf of
Himself and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

Case No. 1:05-cv-00316-GMS

CLASS ACTION

MICHAEL D. BLUM, On Behalf of Himself and All Others Similarly Situated,	:	
	:	Case No. 1:05-cv-00372-GMS
Plaintiff,	:	
v.	:	<u>CLASS ACTION</u>
MBNA CORP., <i>et al.</i> ,	:	
Defendants.	:	

STIPULATION AND ORDER

WHEREAS putative class member Activist Investmentgesellschaft mbH for account of the PT-Master fund, represented by the law firm of Milberg Weiss Bershad & Schulman LLP, has filed a motion for consolidation of the above-referenced actions, for appointment as Lead Plaintiff and for approval of selection of Lead Counsel, and

WHEREAS said motion is unopposed as of the date below,

IT IS HEREBY STIPULATED AND AGREED, by and between

undersigned counsel for the parties herein and subject to the Order of this Court, that

(i) Lead Plaintiff will serve a consolidated amended complaint no later than 60 days after a decision is entered on the pending motions for appointment of Lead Plaintiff and approval of Lead Counsel, (ii) Defendants' answers to or motions to dismiss the consolidated amended complaint will be served no later than 60 days after the consolidated amended complaint is served, (iii) in the event that a motion to dismiss is made by one or more Defendants, Lead Plaintiff will have 60 days to file its answering

brief in response to such motion to dismiss and the moving Defendant or Defendants will have 45 days to submit their reply.

September 12, 2005

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and Michael D. Blum*

SO ORDERED, this ____ day of September, 2005

United States District Judge